

From: [Carl Wassilie](#)
To: [donlingoldeis_POA](#)
Subject: [EXTERNAL] ABVN Comments on Donlin Gold Project Final EIS
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Alaska's Big Village Network

May 31, 2016

Sheila Newman
US Army Corps of Engineers Alaska District
Regulatory Division (1145)
CEPOA-RD-SS
Post Office Box 6898
JBER, Alaska 99506-0898

POA.donlingoldeis@usace.army.mil

re: Donlin Gold Project Final EIS

Alaska's Big Village Network (ABVN) submits these comments on behalf of hundreds of members. ABVN is the free association of people to create communities of inclusion of indigenous peoples and non-indigenous peoples for community well-being for future generations.

Thank you for the opportunity to comment on concerns of the inadequacies of the proposed project. ABVN requests Alternative 1: No Action.

ABVN requests the No Action Alternative due to the nature of permanent and irreversible negative impacts to subsistence ways of life, cultural survival and basic human rights of many indigenous peoples. Most directly impacted with long term impacts over multiple generations are Yup'ik people with the immediate mine footprint; yet many other peoples around the world are also impacted negatively with the toxic contaminants being released into waterways, airways and food systems regionally and globally.

The impacts and effects of the full cradle-to-grave contaminant pathways of many chemicals have not been fully, nor adequately studied to understand the full range of impacts and effects to food, water and human health in the Y-K Region, Bering Sea and other areas not listed in the project proposal. The project proposal has little to no information for contaminant storage and infrastructure to address safety and security of the toxic materials and chemicals beyond Alaska.

The proposed Donlin Gold Project has little information of the long-term cumulative effects of many of the dozens of toxic chemicals associated with mining activities in fresh water habitats, as well as salt water habitats. These habitats provide nurseries for many migratory species that account for basic supplemental human nutritional needs and cultural vitality for millions of people. The Donlin Mine project has human rights implications in many phases of the proposal. A single catastrophic event on water can forever destroy multiple species of fish, birds, plants, mammals.

The enormity of the proposed Donlin Gold megamine project is well beyond the

capacity of the State of Alaska to administer laws and regulations; in particular all Alaska communities along the proposal have extremely low capacity for emergency response and security. The mining associated activities puts enormous strain on hundreds of Alaskan Tribal Governments; as well as significant burdens on dozens of other jurisdictions not mentioned in the cradle-to-grave footprint of the toxic materials, energy developments and infrastructure needed under this proposal.

Furthermore, I would like to add the comments of EarthJustice dated May 31, 2016. The EarthJustice comments highlight more indepth inadequacies with the mine proposal.

Once again, ABVN request that the Army Corps of Engineers choose Alternative 1: No Action to be taken on the Donlin Gold mine project.

Sincerely,

Carl G. Wassilie
Yupik Biologist
Alaska's Big Village Network